

ORIGINAL  
FILED  
06 JAN 18 PM 4:03  
Filing  
RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

MENNEMEIER, GLASSMAN & STROUD LLP  
ANDREW W. STROUD (SBN 126475)  
STEPHEN LAU (SBN 221051)  
980 9<sup>th</sup> Street, Suite 1700  
Sacramento, CA 95814-2736  
Telephone: 916-553-4000  
Facsimile: 916-553-4011

Attorneys for Plaintiff Jim Marshall

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

SBA

C 06 0329

JIM MARSHALL,

Plaintiff,

v.

VINTAGE VINYL, INC., an Illinois  
corporation,

Defendant.

Case No.

COMPLAINT FOR COPYRIGHT  
INFRINGEMENT AND FALSE  
DESIGNATION OF ORIGIN

DEMAND FOR JURY TRIAL

Plaintiff Jim Marshall brings this action against defendant Vintage Vinyl, Inc. for  
injunctive relief and damages under the Copyright and Trademark laws of the United States as  
follows:

**THE PARTIES**

1. Plaintiff Jim Marshall ("plaintiff") is an individual who resides and does  
business in the Northern District of California.

2. On information and belief, Vintage Vinyl, Inc. ("defendant") is a  
corporation incorporated in the State of Illinois. Defendant transacts interstate business  
throughout the United States from its Internet website <http://www.vvmo.com>.

**JURISDICTION**

3. This is a civil action arising, *inter alia*, under the Copyright and  
Trademark laws of the United States. This Court has jurisdiction over the subject matter of the

1 First and Second Claims for Relief pursuant to 15 U.S.C. § 1121, 17 U.S.C. § 501, 28 U.S.C.  
2 § 1331, and 28 U.S.C. § 1338.

3 **VENUE**

4 4. Venue in this district is proper under 28 U.S.C. §§ 1391(b) and (c) and 28  
5 U.S.C. § 1400(a).

6 **ALLEGATIONS COMMON TO BOTH CLAIMS FOR RELIEF**

7 5. Plaintiff is an internationally recognized professional photographer.

8 6. Plaintiff is the creator and copyright owner of photographs of many well-  
9 known musicians, such as Johnny Cash, Jimi Hendrix, Janis Joplin, Jim Morrison, Led Zeppelin,  
10 Bob Dylan, The Rolling Stones and The Beatles. Plaintiff was the only photographer to whom  
11 The Beatles granted backstage access at their last concert, and was one of the principal  
12 photographers at the Monterey Pop Festival and the original Woodstock.

13 7. Plaintiff's photographs have appeared on over 500 record covers, and in  
14 domestic and international publications including *Newsweek*, *Time*, *Life*, *The Saturday Evening*  
15 *Post*, *Look*, and *Rolling Stone*.

16 8. Some of plaintiff's art photography is in the Smithsonian Institute's  
17 permanent collection.

18 9. Johnny Cash ("Mr. Cash"), who passed away in 2003, was one of the most  
19 accomplished, famous, and recognizable country music artists of our time.

20 10. Over the course of his nearly 50-year career, Mr. Cash recorded more than  
21 1,500 songs. Over 50 million copies of his recordings have been sold. Mr. Cash was the subject  
22 of a biographical motion picture in 2005.

23 11. In 1969, Mr. Cash gave a concert at San Quentin Prison in California. The  
24 San Quentin concert included the first public performance of *A Boy Named Sue*, one of  
25 Mr. Cash's best-known songs. Plaintiff was the only photographer given permission to  
26 photograph Mr. Cash at San Quentin.

27 12. Plaintiff first met Mr. Cash in 1962, and they remained friends until the  
28 time of Mr. Cash's death.

1           13. "Johnny Cash 1969" (the "copyrighted work") is a photograph that  
2 plaintiff took of Mr. Cash at San Quentin. A true and correct copy of the copyrighted work is  
3 attached hereto and marked Exhibit "A."

4           14. Plaintiff considers the copyrighted work to be a sufficiently important part  
5 of his life's work to have included it in *Not Fade Away: The Rock and Roll Photography of Jim*  
6 *Marshall*. In addition, because of the unique and evocative nature of the copyrighted work,  
7 plaintiff is particularly protective of the use of that image.

8           15. The copyrighted work is the subject of United States Copyright Office  
9 Certificate of Registration No. VA 932-352, issued to plaintiff on or about July 17, 1998. A true  
10 and correct copy of the Certificate of Copyright is attached hereto and marked Exhibit "B."

11           16. Since the creation of the copyrighted work, plaintiff has continued to  
12 comply with provisions of the Copyright Act with respect to the copyright.

13           17. Plaintiff continues to be the sole proprietor of all right, title and interest in  
14 and to the copyrighted work.

15           18. Plaintiff has never conveyed any right, title or interest in or to the  
16 copyrighted work to any other person. Plaintiff has never released the copyrighted work into the  
17 public domain.

18           19. Plaintiff has learned that defendant has nevertheless publicly exhibited,  
19 offered for sale and sold articles – namely T-shirts and sweatshirts – that infringe the copyright  
20 that plaintiff owns. Defendant's website, accessed on January 9, 2006, offers for sale several  
21 such infringing items. (A true and correct copy of that webpage is attached hereto as Exhibit  
22 "C.") Those items include:

- 23           a. a T-shirt bearing the title "REGARDS, JOHNNY CASH : THE  
24           ALTERNATE 'FINGER'" (A true and correct copy of the image  
25           as it appears on this T-shirt is attached hereto as Exhibit "D");  
26           b. a T-shirt bearing the title "THE FINGER" (A true and correct copy  
27           of the image as it appears on this T-shirt is attached hereto as  
28           Exhibit "E"); and

1 c. a sweatshirt bearing the title "THE FINGER."

2 20. The infringing T-shirt called "THE FINGER" bears an image identical to  
3 plaintiff's copyrighted work, with the words "Johnny Cash" printed beneath the image.

4 21. The infringing T-shirt called "REGARDS, JOHNNY CASH : THE  
5 ALTERNATE 'FINGER'" bears an image that is identical to plaintiff's copyrighted work, with  
6 three alterations: (1) the copyrighted image has been cropped to show only Mr. Cash's face and  
7 hand; (2) the copyrighted image has been colorized; and (3) the words "regards, Johnny Cash"  
8 have been placed next to the face of Mr. Cash.

9 22. Plaintiff believes that the sweatshirt called "THE FINGER" also bears an  
10 image that is identical to or somehow derived from plaintiff's copyrighted work.

11 23. Neither plaintiff, nor anyone authorized by him, has at any time licensed  
12 defendant to reproduce, advertise, distribute, sell, exhibit, or otherwise deal in the copyrighted  
13 work, whether on T-shirts, sweatshirts, or on any other article.

14 **FIRST CLAIM FOR RELIEF**

15 **(Copyright Infringement)**

16 24. Plaintiff incorporates by this reference and realleges each and every  
17 allegation set forth in paragraphs 1 through 23 herein.

18 25. By reason of the foregoing, defendant's conduct has infringed plaintiff's  
19 copyright interest in the copyrighted work, including plaintiff's exclusive right to reproduce the  
20 copyrighted work and to prepare derivative works based upon the copyrighted work.

21 26. The activities of defendant in intentionally or negligently offering for sale,  
22 distributing and/or publicly exhibiting articles that infringe the aforementioned copyright  
23 constitute willful acts of infringement.

24 27. This extensive and wide reaching infringement is likely to severely  
25 diminish the value of plaintiff's work by the distribution of inferior copies on T-shirts and  
26 sweatshirts of a work of fine art closely associated with plaintiff. By reason of the foregoing,  
27 plaintiff has and will suffer irreparable damage to his business, reputation, and goodwill.  
28

1           28. Plaintiff is informed and believes, and on that basis alleges, that unless  
2 enjoined by this Court, defendant intends to continue its course of conduct and to wrongfully use,  
3 infringe upon, sell and otherwise profit from the copyrighted work. As a direct and proximate  
4 result of the acts of defendant alleged above, plaintiff has already suffered irreparable damage.  
5 Plaintiff has no adequate remedy at law to redress all of the injuries that defendant has caused  
6 and intends to cause by its conduct. Plaintiff will continue to suffer irreparable damage until  
7 defendant's actions alleged above are enjoined by this Court.

8                                   **SECOND CLAIM FOR RELIEF**

9                                   **(False Designation of Origin)**

10           29. Plaintiff incorporates by this reference and realleges each and every  
11 allegation set forth in paragraphs 1 through 28.

12           30. Defendant, while doing business in interstate commerce, has intentionally  
13 or negligently misrepresented the source of defendant's products to actual and potential  
14 customers of defendant and to other third parties.

15           31. Defendant's wrongful conduct constitutes a violation of Section 43(a) of  
16 the Lanham Act, 15 U.S.C. § 1125(a).

17           32. As a result of the foregoing, plaintiff has been damaged in an amount  
18 which is not precisely ascertainable, but which will be inserted herein by amendment at such time  
19 as it is precisely ascertained.

20           33. Plaintiff has no adequate remedy at law for defendant's wrongful conduct  
21 in that (i) if defendant's wrongful conduct continues, consumers are likely to become further  
22 confused as to the source of the copyrighted work, (ii) defendant's use constitutes an interference  
23 with plaintiff's goodwill and reputation, and (iii) defendant's conduct, and the resultant damages  
24 to plaintiff, are continuing.

25           34. Accordingly, plaintiff is entitled to preliminary and permanent injunctive  
26 relief pursuant to 15 U.S.C. § 1116(a).

35. Defendant has been guilty of oppression, fraud and malice in doing the things herein, by reason of which plaintiff is entitled to damages for the sake of example and by way of punishing defendant.

36. Plaintiff is also entitled to recover his attorney's fees and costs of suit pursuant to 15 U.S.C. § 1117(a).

### **PRAYER FOR RELIEF**

WHEREFORE, plaintiff demands judgment as follows:

#### **A. On the First Claim For Relief, Judgment in Favor of Plaintiff:**

1. Preliminarily and permanently enjoining defendant from engaging in any conduct constituting an infringement of plaintiff's copyright identified above;
2. Directing the destruction of all goods infringing plaintiff's copyright in the possession, custody or control of defendant;
3. Awarding plaintiff either his actual damages and defendant's profits from their infringing activities or, at plaintiff's subsequent election, statutory damages, together with his costs of this action, including his reasonable attorneys' fees; and
4. That defendant, within thirty days after service of judgment, with notice of entry thereof upon defendant, be required to file with the Court and serve upon plaintiff a written report under oath setting forth in detail the manner in which defendant has complied with the injunctive relief requested herein.

#### **B. On the Second Claim For Relief, Judgment in Favor of Plaintiff:**

1. That defendant account for and pay over to plaintiff all damages sustained by them and all profits realized by defendant by reason of defendant's unlawful acts alleged herein pursuant to 15 U.S.C. §1117(a) and that plaintiff be awarded recovery of the full costs of this action against defendant;
2. That plaintiff be awarded three times the amount of his damages or defendant's profits, whichever is greater, together with a reasonable attorney's fee pursuant to 15 U.S.C. §1117(b); and

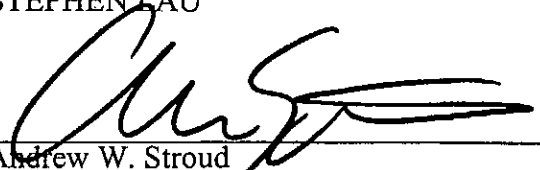
///

C. On All Claims For Relief:

1. For such other and further relief as the Court may deem just and proper.

Dated: January 12, 2006

MENNEMEIER, GLASSMAN & STROUD LLP  
ANDREW W. STROUD  
STEPHEN LAU

  
\_\_\_\_\_  
Andrew W. Stroud  
Attorneys for Plaintiff Jim Marshall

**DEMAND FOR JURY TRIAL. [FRCP Rule 38(b)]**

Pursuant to Rule 38(b) of the Federal Rules of Civil Procedure, plaintiff hereby  
demands a jury trial herein.

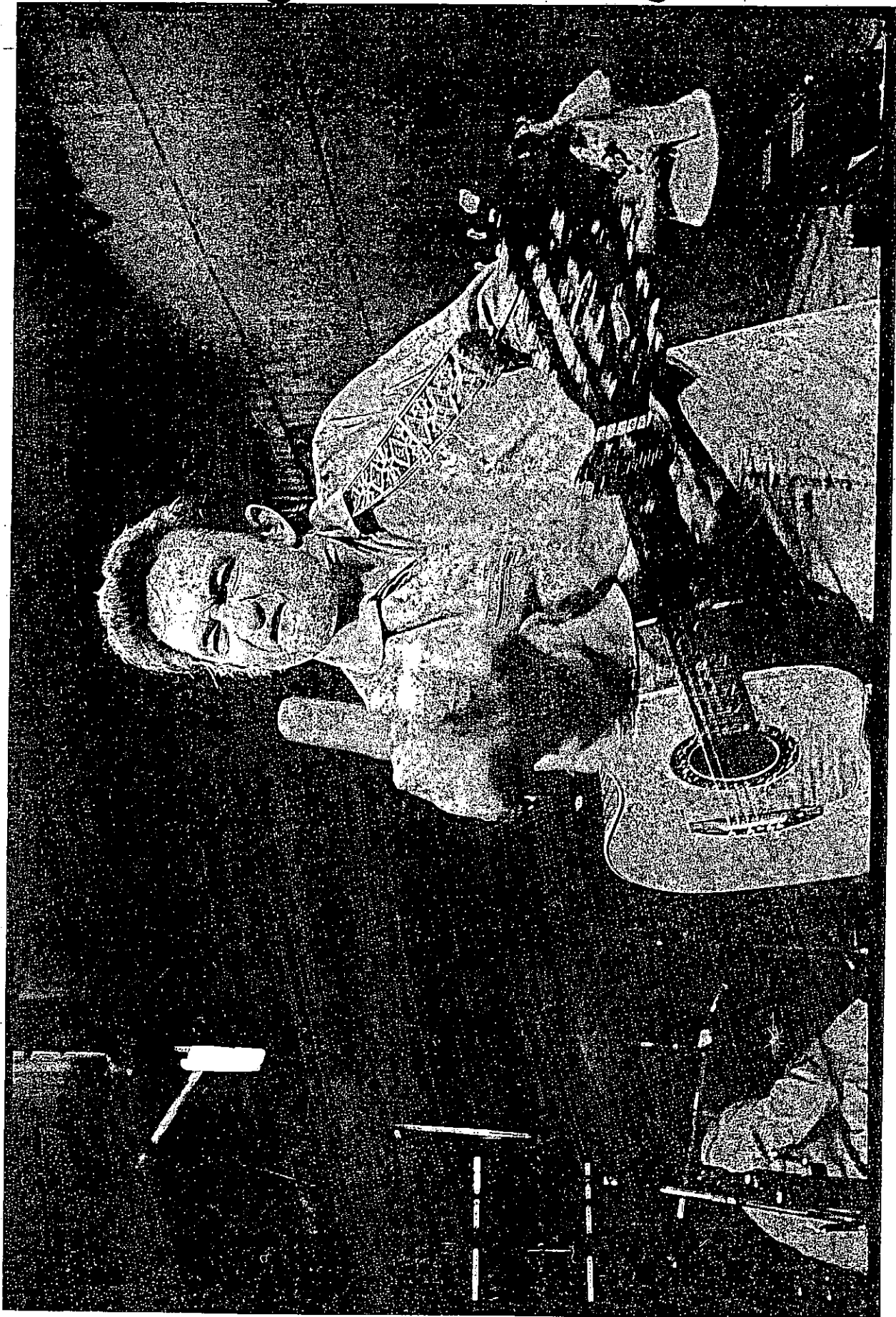
Dated: January 12, 2006

MENNEMEIER, GLASSMAN & STROUD LLP  
ANDREW W. STROUD  
STEPHEN LAU

  
\_\_\_\_\_  
Andrew W. Stroud  
Attorneys for Plaintiff Jim Marshall

**EXHIBIT A**





**EXHIBIT B**

## CERTIFICATE OF REGISTRATION



This Certificate issued under the seal of the Copyright Office in accordance with title 17, United States Code, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

*Marybeth Peters*

REGISTER OF COPYRIGHTS  
United States of America

For  
UN  
—  
RE

VA 932-352



EFFECTIVE DATE OF REGISTRATION

7 17 98  
Month Day Year

OFFICIAL SEAL

CONTINUATION SHEET.

1

TITLE OF THIS WORK ▼

NATURE OF THIS WORK ▼ See instructions

Johnny Cash 1969

Photograph

PREVIOUS OR ALTERNATIVE TITLES ▼

PUBLICATION AS A CONTRIBUTION If this work was published as a contribution to a periodical, serial, or collection, give information about the collective work in which the contribution appeared. Title of Collective Work ▼

If published in a periodical or serial give: Volume ▼

Number ▼

Issue Date ▼

On Pages ▼

2

NAME OF AUTHOR ▼

a Jim Marshall

DATES OF BIRTH AND DEATH

Year Born ▼

Year Died ▼

1936

N/A

Was this contribution to the work a  
"work made for hire"?  
☐ Yes  
☒ No

AUTHOR'S NATIONALITY OR DOMICILE  
Name of Country

OR { Citizen of United States

Domiciled in \_\_\_\_\_

WAS THIS AUTHOR'S CONTRIBUTION TO  
THE WORK

Anonymous? ☐ Yes ☒ No

Pseudonymous? ☐ Yes ☒ No

If the answer to  
of these questions  
"Yes," see detailed  
instructions.

## NOTE

Under the law, the "author" of a "work made for hire" is generally the employer, not the employee (see instructions). For any part of this work that was "made for hire" check "Yes" in the space provided, give the employer (or other person for whom the work was prepared) as "Author" of that part, and leave the space for dates of birth and death blank.

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions

☐ 3-Dimensional sculpture

☐ Map

☐ Technical drawing

☐ 2-Dimensional artwork

☒ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

☐ Design on sheetlike material

NAME OF AUTHOR ▼

b

DATES OF BIRTH AND DEATH

Year Born ▼

Year Died ▼

Was this contribution to the work a  
"work made for hire"?  
☐ Yes  
☐ No

AUTHOR'S NATIONALITY OR DOMICILE  
Name of Country

OR { Citizen of \_\_\_\_\_

Domiciled in \_\_\_\_\_

WAS THIS AUTHOR'S CONTRIBUTION TO  
THE WORK

Anonymous? ☐ Yes ☐ No

Pseudonymous? ☐ Yes ☐ No

If the answer to  
of these questions  
"Yes," see detailed  
instructions.

NATURE OF AUTHORSHIP Check appropriate box(es). See instructions

☐ 3-Dimensional sculpture

☐ Map

☐ Technical drawing

☐ 2-Dimensional artwork

☐ Photograph

☐ Text

☐ Reproduction of work of art

☐ Jewelry design

☐ Architectural work

☐ Design on sheetlike material

3

a YEAR IN WHICH CREATION OF THIS  
WORK WAS COMPLETED This information  
must be given  
in all cases. 1969

b DATE AND NATION OF FIRST PUBLICATION OF THIS PARTICULAR WORK  
Complete this information Month Oct. Day 15 Year 1997  
ONLY if this work  
has been published. United States

4

COPYRIGHT CLAIMANT(S) Name and address must be given even if the claimant is the same as the author given in space 2. ▼

Jim Marshall  
3622 16th Street  
San Francisco, CA 94114

TRANSFER If the claimant(s) named here in space 4 is (are) different from the author(s) named in space 2, give a brief statement of how the claimant(s) obtained ownership of the copyright. ▼

APPLICATION RECEIVED

JUL 17 1998

ONE DEPOSIT RECEIVED

TWO DEPOSITS RECEIVED

JUL 17 1998

FUNDS RECEIVED

DO NOT WRITE HERE  
OFFICE USE ONLY

MORE ON BACK ►

• Complete all applicable spaces (numbers 5-9) on the reverse side of this page.  
• See detailed instructions. • Sign the form at line 5

DO NOT WRITE

Page 1 of 1

Added by C.O. via telephone conversation of 4-15-99  
with Lawrence G. Townsend.

EXAMINED BY

CHECKED BY

FORM VA

☐ CORRESPONDENCE  
Yes

FOR  
COPYRIGHT  
OFFICE  
USE  
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☐ No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼

a. ☐ This is the first published edition of a work previously registered in unpublished form.

b. ☐ This is the first application submitted by this author as copyright claimant.

c. ☐ This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ▼

Year of Registration ▼

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name ▼

Account Number ▼

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt/City/State/ZIP ▼

Lawrence G. Townsend

Owen Wickersham & Erickson

455 Market Street, 19th Floor

San Francisco, CA 94105

Area Code and Telephone Number ▶ 415-882-3290

CERTIFICATION\* I, the undersigned, hereby certify that I am the  
check only one ▼

☒ author

☐ other copyright claimant

☐ owner of exclusive right(s)

☐ authorized agent of

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

of the work identified in this application and that the statements made  
by me in this application are correct to the best of my knowledge.

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

Jim Marshall

Date ▶

6/5/98

Handwritten signature (X) ▼

JAMES J. Marshall

MAIL  
CERTIFI-  
CATE TO

Name ▼

Lawrence G. Townsend

Number/Street/Apt. ▼

Owen Wickersham & Erickson

455 Market Street, 19th Floor

City/State/ZIP ▼

San Francisco, CA 94105

Certificate  
will be  
mailed in  
window  
envelope

#### YOU MUST:

- Complete all necessary spaces
- Sign your application in space 8

#### SEND ALL 3 ELEMENTS IN THE SAME PACKAGE:

1. Application form
2. Nonrefundable \$20 filing fee in check or money order payable to Register of Copyrights
3. Deposit material

#### MAIL TO:

Register of Copyrights  
Library of Congress  
Washington, D.C. 20559-6000

The Copyright Office has the authority to add just fees at 3-year intervals, based on changes in the Consumer Price Index. The next adjustment is due in 1998. Please contact the Copyright Office after June 1995 to determine the actual fee schedule.

**EXHIBIT C**



## T-SHIRTS (Music)

(This page last updated January 4, 2006.)

NOTE : The majority of t-shirts we carry are in large and extra large sizes.

Smaller sizes may take extra time to order(up to 2 months!!). Specify in "Questions" field on orderform size desired.

Please call or e-mail us for any further details regarding shirts.

| **BEAT-YOUN** |  
|| Movies ||

*To add item[s] to your shopping cart, and for all payment details and options, click on the box next to an item,  
click the 'Add to Cart' button at the bottom of the page, and then proceed to checkout.*

ADD	FMT	ARTIST	TITLE	Cat#/Remarks	PRICE
<input type="checkbox"/>	T-SHIRT	BEATLES, THE	ABBEY ROAD (image)	WHITE SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	BEATLES, THE	ROYAL COMMAND PERFORMANCES LONDON 1963 (image)	BLACK SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	BEATLES, THE	RUBBER SOUL (image)	WHITE SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	BEATLES, THE	YELLOW SUBMARINE (image)	WHITE SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	BEATLES, THE	YESTERDAY AND TODAY : BUTCHER COVER!! (image)	WHITE SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	BEATLES, THE (GEORGE HARRISON)	PORTRAIT (image)	WHITE SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	BJORK	PORTRAIT ON FRONT/NAME ON BACK	L, XL - TAN	\$19.99
<input type="checkbox"/>	T-SHIRT	BROWN, JAMES	YOUNG STAGE SHOT @ MIC W/NAME	L, XL - WHITE	\$19.99
<input type="checkbox"/>	T-SHIRT	BUCKLEY, TIM	PORTRAIT (image)	WHITE SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	CASH, JOHNNY	AWARDS (front image and back image)	BLACK SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	CASH, JOHNNY	I SHOT A MAN IN RENO JUST TO WATCH HIM DIE (image)	WHITE SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	CASH, JOHNNY	REGARDS, JOHNNY CASH : THE ALTERNATE "FINGER" (image)	WHITE SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	CASH, JOHNNY	REGARDS, JOHNNY CASH : THE ALTERNATE "FINGER" (image)	WHITE SHIRT - EXTRA-LARGE	\$19.99



<input type="checkbox"/>	T-SHIRT	CASH, JOHNNY	THE FINGER (be the coolest at Christmas dinner sporting this shirt)	BLACK SHIRT - MEDIUM	\$19.99
<input type="checkbox"/>	T-SHIRT	CASH, JOHNNY	THE FINGER (be the coolest at the mall sporting this shirt)	BLACK SHIRT - SMALL	\$19.99
<input type="checkbox"/>	T-SHIRT	CASH, JOHNNY	THE FINGER (be the coolest at the movie sporting this shirt)	BLACK SHIRT - EXTRA LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	CASH, JOHNNY	THE FINGER (image)	BLACK SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	CASH, JOHNNY	THE FINGER (image)	BLACK SHIRT - 2XL	\$19.99
<input type="checkbox"/>	SWEATSHIRT	CASH, JOHNNY	THE FINGER (BLACK HOODIE WITH THE FINGER IMAGE ON BACK-FRONT HAS IMAGE WITH LIFESPAN DATES)	BLACK SWEATSHIRT - XL	\$39.99
<input type="checkbox"/>	T-SHIRT	CLASH, THE	GROUP PHOTO (image)	WHITE SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	COCKSPARRER	BLOODY WINGED LOGO	L, XL - BLACK	\$19.99
<input type="checkbox"/>	T-SHIRT	CURE, THE	ROBERT SMITH PORTRAIT (image)	WHITE SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	DICKIES, THE	DAWN OF THE DICKIES	L, XL - BLACK	\$19.99
<input type="checkbox"/>	T-SHIRT	DICKIES, THE	GIGANTOR	L, XL - BLACK	\$19.99
<input type="checkbox"/>	T-SHIRT	DYLAN, BOB	PORTRAIT (image)	WHITE SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	GRATEFUL DEAD, THE	SKULL (image)	WHITE SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	HENDRIX, JIMI	PORTRAIT (image)	WHITE SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	JOPLIN, JANIS	PORTRAIT (image)	WHITE SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	KINKS, THE	PINK BAND LOGO	L, XL - BLACK	\$19.99
<input type="checkbox"/>	T-SHIRT	LED ZEPPELIN	1ST LP COVER (image)	WHITE SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	LED ZEPPELIN	STAIRWAY TO HEAVEN (image)	BLACK SHIRT - EXTRA LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	NEW YORK DOLLS, THE	FOUR WHITE FACES (W/PINK LIPSTICK)	L, XL - BLACK	\$19.99
<input type="checkbox"/>	T-SHIRT	NEW YORK DOLLS, THE	S/T ARTWORK, BAND ON COUCH	L, XL - BLACK	\$19.99
<input type="checkbox"/>	T-SHIRT	NIRVANA	WITH THE LIGHTS OUT (image)	BLACK SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	NIRVANA (KURT COBAIN)	TEEN SPIRIT (image)	WHITE SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	RAMONES, THE	GROUP PHOTO (image)	WHITE SHIRT - LARGE	\$19.99

<input type="checkbox"/>	T-SHIRT	RAMONES, THE	ROAD TO RUIN (image)	WHITE SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	REPLACEMENTS, THE	LET IT BE (image)	WHITE SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	ROLLING STONES, THE	A BIGGER BANG 2005 TOUR (image)	BLACK SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	ROLLING STONES, THE (KEITH RICHARDS)	PORTRAIT (image)	WHITE SHIRT - LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	SEX PISTOLS, THE	GOD SAVE THE QUEEN	L, XL - NAVY BLUE	\$19.99
<input type="checkbox"/>	T-SHIRT	SMITHS, THE	MEAT IS MURDER	L, XL - WHITE	\$19.99
<input type="checkbox"/>	T-SHIRT	SMITHS, THE	SALFORD LADS CLUB GROUP SHOT	L, XL - BLACK	\$19.99
<input type="checkbox"/>	T-SHIRT	T. REX	ELECTRIC WARRIOR (LP COVER)	L, XL - BLACK	\$19.99
<input type="checkbox"/>	T-SHIRT	THUNDERS, JOHNNY	BORN TO CRY	L, XL - BLACK	\$19.99
<input type="checkbox"/>	T-SHIRT	VINTAGE VINYL STORE SHIRT	25 YEAR CELEBRATION SHIRT (Celebrate with us!)	PINK WITH BLACK INK-MEDIUM	\$19.99
<input type="checkbox"/>	T-SHIRT	VINTAGE VINYL STORE SHIRT	25 YEAR CELEBRATION SHIRT (Celebrate with us!)	PINK WITH BLACK INK-EXTRA LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	VINTAGE VINYL STORE SHIRT	25 YEAR CELEBRATION SHIRT (Celebrate with us!)	PINK WITH BLACK INK-LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	WHO, THE	MAXIMUM R & B (image)	BLACK SHIRT - EXTRA LARGE	\$19.99
<input type="checkbox"/>	T-SHIRT	WILLIAMS, HANK	PORTRAIT	L, XL - BLACK	\$19.99
<input type="checkbox"/>	T-SHIRT	YOUNG, NEIL	LIKE A HURRICANE (image)	WHITE SHIRT - LARGE	\$19.99

| BEAT-YOUN |  
|| Movies ||

[Back to Top](#)

Add to Cart/Checkout.

| [Home](#) | [Search](#) | [Recent Arrivals](#) | [Catalog](#) | [About Us](#) | [Helpful Hints](#) | [Links](#) |



**EXHIBIT D**



**EXHIBIT E**

